

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE:	)	Chapter 11
	)	
KAISER GROUP INTERNATIONAL,	)	Case No. 00-2263 (MFW)
INC., <i>et al.</i> ,	)	
	)	(Jointly Administered)
Debtors.	)	
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JAMES D. PIPPIN and the CLASS OF ICT	)	
SPECTRUM BANKRUPTCY CLAIMANTS,	)	
	)	
Appellants,	)	
v.	)	Civil Action No. 05-384-JFF
	)	
KAISER GROUP INTERNATIONAL,	)	
INC., et al.,	)	
	)	
Appellees.	)	

## STIPULATION AND ORDER TO DISMISS APPEAL

NOW COMES Appellants James D. Pippin and the Class of ICT Spectrum  
Bankruptcy Claimants (collectively the “Spectrum Claimants”) and Appellees Kaiser Group  
International, Inc., and affiliated debtors<sup>1</sup> (collectively the “Debtors”); and having reached an  
agreement that resolves the above-captioned matter, by and through their undersigned counsel  
those “Parties” hereby stipulate, subject to approval of the Court, as follows:

1. On February 2, 2004, the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) granted the *Motion of Claimant James D. Pippin and the Class of ICT Spectrum Claimants for Resolution of the Class Claim*. This Court affirmed the Bankruptcy Court’s order on June 24, 2005. The Debtors then appealed this Court’s decision to the United States Court of Appeals for the Third Circuit (the “Third Circuit”).

<sup>1</sup> The affiliated debtors include Kaiser Engineers Massachusetts, Inc., Kaiser Technology Holdings, Inc., Tudor Engineering Company, Kaiser Engineers Group, Inc., Kaiser Engineers, Inc., Kaiser Engineers International, Inc., Kaiser Engineers and Constructors, Inc., Kaiser Overseas Engineering, Inc. and Kaiser Holdings Unlimited, Inc.

2. On May 6, 2005, the Spectrum Claimants filed a motion before the Bankruptcy Court, pursuant to Fed. R. Bankr. P. 8005, for a stay of the Debtors' efforts to voluntarily terminate the registration of Kaiser Group Holdings, Inc. common stock pending final disposition of the Bankruptcy Court's February 2, 2004 order granting the *Motion of Claimant James D. Pippin and the Class of ICT Spectrum Claimants for Resolution of the Class Claim*. On May 24, 2005, the Debtors filed an opposition to the Spectrum Claimant's motion.

3. After holding a hearing on the matter on May 31, 2005, the Bankruptcy Court, on June 2, 2005, entered an order denying the Spectrum Claimants' motion. The Spectrum Claimants then commenced this appeal, and requested expedited action pursuant to Fed. R. Bankr. P. 8011(d) on the ground that, to avoid irreparable harm, relief was needed in less time than would normally be taken by this Court to consider a bankruptcy appeal. The Spectrum Claimants later requested that this Court waive mandatory mediation of this appeal.

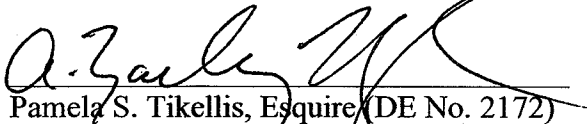
4. On September 19, 2005, after entering into settlement negotiations that yielded an agreement in principle, the Parties filed a stipulation to stay this appeal to permit the Parties to consummate a final settlement. On October 13, 2005, this Court approved the stipulation and stayed and closed this action administratively.

5. On October 19, 2005, the Debtors and the Spectrum Claimants entered into a Stipulation and Agreement of Settlement that provides for, among other things, voluntary dismissal of both this appeal and the Debtors' Third Circuit appeal, with each of the Parties to bear their own costs in both appeals.

6. On November 16, 2005, the Parties filed a motion in the Bankruptcy Court seeking final approval of the Stipulation and Agreement of Settlement. No objections to the settlement were filed nor made at the December 6, 2005 hearing on the motion. On December 7,

2005, the Bankruptcy Court entered an order approving the Stipulation and Agreement of Settlement pursuant to Fed. R. Bankr. P. 9019 and 7023.

7. For the forgoing reasons, the Spectrum Claimants and the Debtors jointly request that this Court dismiss this appeal, with each Party to bear its own costs.

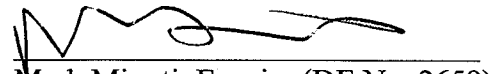
  
Pamela S. Tikellis, Esquire (DE No. 2172)  
A. Zachary Naylor (DE No. 4439)  
CHIMICLES & TIKELLIS LLP  
One Rodney Square  
P. O. Box 1035  
Wilmington, DE 19899  
(302) 656-2500

and

William R. Kane, Esquire  
Michael S. Tarringer, Esquire  
MILLER FAUCHER AND CAFFERTY LLP  
One Logan Square, Suite 1700  
18<sup>th</sup> & Cherry Streets  
Philadelphia, PA 19103  
(215) 864-2800

Attorneys for James Pippin and the Class

Dated: January 12, 2006

  
Mark Minuti, Esquire (DE No. 2659)  
SAUL EWING LLP  
222 Delaware Avenue, Suite 1200  
P. O. Box 1266  
Wilmington, DE 19899  
(302) 421-6840

and

Kenneth N. Klee, Esquire  
Daniel J. Bussel, Esquire  
KLEE, TUCHIN, BOGDANOFF  
& STERN LLP  
2121 Avenue of the Stars  
Thirty-Third Floor  
Los Angeles, CA 90067-5061  
(310) 407-4000

Attorneys for the Debtors

Dated: January 12, 2006

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2006

\_\_\_\_\_  
Joseph J. Farnan, Jr., United States District Court Judge